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10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

Case No. 4:21-CR-06042-SMJ

14 v.

United States' Status Report
Concerning the Nature and Extent
of Anticipated Additional
Discovery

15 ALI ABED YASER
16 HUSSEIN A. YASIR
17 INSAF A. KARAWI,
18 HASANEIN A. YASER,
19 AHMAD K. BACHAY
20 (a/k/a "Muthalath," "Humayad"),
21 MASHAEL A. BACHAY,
22 MOHAMMAD BAJAY
23 (a/k/a "Abu Jabbar"),
24 HUSSAIN K. BACHAY,
25 NOOR TAHSEEN AL-MAAREJ
26 (a/k/a "Noor T. Almarej"),
27 ALI F. AL-HIMRANI,
RANA J. KAABAWI,
AMAR F. ABDUL-SALAM,
AMEER R. MOHAMMED,
MOHAMMED F. AL-HIMRANI,
MARIA ELENA SANCHEZ,
SEIFEDDINE A. AL-KINANI,
ABDULLAH AL-DULAIMI,
FIRAS S. HADI,

1 FAROOQ S. YASEEN,
2 KHALIL ABDUL-RAZAQ,
3 JESUS GEORGE SANCHEZ,
4 SINAN AKRAWI, and
5 MOHAMMED NAJI AL-JIBORY,

Defendants.

6 Plaintiff, United States of America, by and through Vanessa R. Waldref,
7 United States Attorney for the Eastern District of Washington, and Dominique Juliet
8 Park, and George J.C. Jacobs, III, Assistant United States Attorneys for the Eastern
9 District of Washington, submits this status report, as ordered by the Court at ECF
10 No. 185, concerning the nature and extent of anticipated additional discovery.

11 **Anticipated Additional Discovery**

12 To the best of its knowledge, the United States anticipates the nature and
13 extent of additional discovery will include:

- 14 • Grand jury transcripts
- 15 • Out-of-district (SDCA) search warrants and applications executed in
- 16 connection with the investigation
- 17 • ESI (*e.g.*, digital forensic copies of electronic devices) seized pursuant
- 18 to search warrants¹
- 19 • ESI seized from Defendant Maria Elena Sanchez that is undergoing a
- 20 filter review for attorney-client privilege material
- 21 • Jail calls
- 22 • Pole camera video²
- 23 • Witness criminal histories

24 ¹ Production of all seized and imaged electronic devices will require approximately
25 14 Terabytes (“TB”) of storage capacity.

26 ² The pole camera was situated down the street from the residence of Defendant Ali
27 Abed Yaser from approximately August 15, 2019, to June 16, 2020. Production of
the pole camera video will require approximately 1.81 TBs of storage capacity.

- Defendant criminal histories³
- Copies of communications obtained from the confidential human source's ("CHS") phones relevant to the case
- Copies of text messages and call logs from the FBI Special Agent Matthew McKay's (the case agent) relevant to the case
- Copies of text messages and call logs obtained from FBI linguist Ghassan Hajjar's phone with the CHS relevant to the case
- Finalized English-translations (summary and/or verbatim) of recorded Arabic conversations involving the CHS and other individuals relevant to this case
- FBI Sentinel (automated case management system) records from November 2021 to present relevant to this case
- Information (including monetary benefits) regarding the CHS
- *Henthorn* material (if any)

First Discovery Production

On the dates below, the United States made an initial production of discovery to counsel representing thirteen defendants:

Defendant	Counsel	Date Sent
Ali Abed Yaser (1)	Craig Webster	12/28/2021
Hussein Yasir (2)	Adam Pechtel	12/28/2021
Ameer Mohammed (13)	Ricardo Hernandez	12/28/2021
Khalil Abdul-Razaq (20)	Zachary Ayers	12/28/2021
Mohammed Naji Al-Jibory (20)	Bryan Whitaker	12/28/2021
Mohammed Al-Himrani (14)	Deric Orr	1/3/2022
Ali F. Al-Himrani (10)	Scott Johnson	1/3/2022
Noor Tahseen Al-Mareej (9)	Gregory Lockwood	1/4/2022
Insaf Karawi (3)	Nicholas W. Marchi	1/5/2022
Seifeddine A. Al-Kinani (16)	Gregory Scott	1/5/2022
Firas S. Hadi (18)	Gary Metro	1/7/2022
Hasanein Yaser (4)	Richard Smith	1/7/2022
Jesus George Sanchez (21)	Doug McKinley	1/7/2022

³ Criminal histories of several defendants were produced to defense counsel listed in the first discovery production table.

1 The initial production included:

2	10000001 – 10002606: FBI Reports & Investigative Materials	15.2
	20000001 – 20000354: CHS Audio Files	24.6
3	30000030-30000077, 30000112-30000114, 30000117-30000129, 30000136-30000137: Search Warrants[1]	0.92
	40000001 – 40000018: Additional Reports	0.03
4	50000001 – 50000015: Recorded Interviews	14.1
	60000001 – 60006522: Claim Files	41.7
5	70000001 – 70000544: Bank Records	3.46
	80000001 – 80000689: Other Disclosures	5.14
6		Total: 105.15 GB

7 For each discovery series produced to date, the United States provided a .csv file
8 that contains a full Bates numbered index, including file names, of produced records.
9 An example of the cover letter sent to defense counsel regarding this discovery is
10 attached as Exhibit 1.

11 The United States understands its discovery obligations and intends to
12 continue producing discovery in compliance with these obligations.

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14 Respectfully submitted,

15 Vanessa R. Waldref
16 United States Attorney

17 s/ Dominique Juliet Park
18 Dominique Juliet Park
19 Assistant United States Attorney
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